

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

| | | |
|------------------|---|--------------------------------|
| ----- | X | |
| In re: | : | Chapter 12 |
| | : | |
| LAS MARTAS, INC. | : | Case No. 22-02380 (ESL) |
| | : | |
| Debtor. | : | |
| | : | |
| ----- | X | |

**DEBTOR’S MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO
DISMISS**

TO THE HONORABLE COURT:

COMES NOW the Debtor, Las Martas, Inc., through the undersigned counsel, and respectfully for a 21-day extension of time, concurrent with that sought by and granted to the Trustee, to file its response to Condado’s Motion to Dismiss (Dkt. #207). In support thereof, Debtor states as follows:

1. On June 26, 2025, creditor Condado 5, LLC filed a Motion to Dismiss (Docket 207). Responses to the same are due on July 28, 2025.
2. The Debtor, like the Trustee, needs an additional 21 days to complete its research and draft its response to said Motion to Dismiss. That is particularly true in light of the extensive documentation filed solely in Spanish, a language in which undersigned counsel is not fluent, and assistance is required to review and fully understand those documents.
3. In light of the above, the Debtor requests an additional 21 days, or until August 18, 2025, concurrent with the extension granted to the Trustee, to submit his response to the Motion to Dismiss.

WHEREFORE, the Debtor requests that this Honorable Court grant him an extension of time of 21 days, or until August 18, 2025, to file his response to Condado 5, LLC's Motion to Dismiss.

Dated: July 24, 2025.

Respectfully submitted,

/s/ Daniel M. Press

Daniel M. Press, #204704

CHUNG & PRESS, P.C.

6718 Whittier Ave., Suite 200

McLean, VA 22101

(703) 734-3800

dpress@chung-press.com

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2025, I electronically filed the foregoing with the Clerk of the Court using the Next Gen CM/ECF system, which will send notification of such filing to all Next Gen CM/ECF participants in this case, including counsel for Condado 5, the Chapter 12 Trustee, and the U.S. Trustee for Region 21.

/s/ Daniel M. Press

Daniel M. Press, #204704